

Attestation of Compliance PCI DSS 4.0

Published: 30 June 2024

Updated: 31 Oct 2024

Introduction

The attached documents are Akamai's Attestations of Compliance ("AoCs") with the Payment Card Industry Data Security Standard (PCI DSS) version 4.0. This document serves as a declaration of our compliance status and evidence that Akamai, as a third-party service provider, protects sensitive data, including but not limited to cardholder data. It also demonstrates our commitment to our customers who rely on our PCI DSS compliant solutions for their business, as well as for their own compliance initiatives.

As of June 30, 2024, Akamai has two different AoCs, both of which are attached here.

- 1. An AoC covering Akamai's main security and content delivery solutions, including Bot Manager Premier, Account Protector, and API Security.
 - a. **Update 10/31:** Incorporated API Security (formerly Noname Security) into the scope of covered products
- 2. An AoC covering some of Akamai's cloud computing services.

PCI DSS and Akamai Services

Akamai's services that may be used in a PCI DSS compliant manner include the following:

- Secure CDN with Enhanced TLS (the "Secure CDN");
- Content Delivery products such as Ion, Dynamic Site Accelerator, API Acceleration, and Adaptive Media Delivery, when running on the Secure CDN;
- EdgeWorkers, when running on the Secure CDN;
- mPulse digital performance management services;
- App and API security products such as App & API Protector (including the Malware Protection add-on), Account Protector, Kona Site Defender, API Gateway, Cloudlets, and Bot Manager (Standard and Premier), when running on the Secure CDN;
- API Security (formerly Neosec);
- API Security (formerly Noname Security);
- Client-Side Protection & Compliance;
- Audience Hijacking Protector;
- Secure Internet Access Enterprise (f/k/a Enterprise Threat Protector);



- Akamai MFA;
- Akamai Guardicore Segmentation; and
- The following cloud computing solutions: Dedicated CPU, Shared CPU, and High Memory.

Secure CDN with Enhanced TLS

Akamai's Secure CDN¹ is the core component of its PCI compliant content delivery services. The servers in this network are physically secured against intrusion while being widely distributed around the globe to ensure availability and maximize origin offload. The Secure CDN also provides customers with custom TLS certificates with the flexibility to configure them to satisfy various security and business requirements. The Secure CDN is not typically sold as an independent service but is instead a feature included with most of Akamai's web performance and cloud security products, as described below.

Content Delivery Solutions

Akamai's content delivery solutions, including Ion and such legacy CDN solutions as Terra Alta or Dynamic Site Delivery, typically have the option of having their content delivered securely, in which case that content is delivered via the Secure CDN, and may be used in a PCI DSS compliant manner. Additional products, such as mPulse digital performance management, Cloudlets, and dynamic content delivery options such as adaptive image compression and prefetching options, have all been designed to work on Akamai's Secure CDN servers, and may be configured to be fully compliant with PCI DSS.

Edge Computing Solutions

The Akamai EdgeWorkers solution, which enables customers (developers) to create their own services using JavaScript and deploy them across our Secure CDN, is included in Akamai's PCI DSS assessment and may be used in a manner fully-compliant with PCI DSS.

The Akamai EdgeKV distributed key value store is <u>not</u> PCI DSS compliant, however. Please see "Non-Compliant Services" below for more information.

¹ Akamai offers two levels of TLS delivery over its Secure CDN: Enhanced TLS, which is Akamai's longstanding secure CDN, and Standard TLS, a newer CDN offering intended for less sensitive data, that permits customers to provision their own TLS certificates and deliver traffic over HTTPS. Only Enhanced TLS is approved for use with cardholder data in accordance with PCI DSS. Unless otherwise noted, references to the Secure CDN refer to the Secure CDN with Enhanced TLS.



App and API Security Solutions

As with the above content delivery solutions, Akamai's App & API Protector (including the Malware Protection add-on), Kona Site Defender, Account Protector, and Bot Manager application as well as API security products may be configured to operate over the Secure CDN in a PCI DSS compliant manner.

In addition, the web application firewall (WAF) components of App & API Protector, Kona Site Defender, and Web Application Protector may be used by customers to help satisfy their obligations under Requirements 6.4.1 and 6.4.2 of PCI DSS 4.0.0, all of which encourage the use of a WAF, provided that the WAF is configured appropriately in the customers' environment in a manner that their PCI DSS qualified security assessors agree is appropriate under the circumstances.

Bot Manager provides advanced bot detections designed to detect and mitigate the most sophisticated bots, like those typically seen in use cases such as credential abuse, inventory hoarding, gift card balance checking, and other forms of web fraud. Bot Manager's unmatched detections and mitigation capabilities allow automated operations to run more effectively and safely.

Account Protector is designed to prevent account takeover and human fraudulent activity by detecting during the authentication process whether a human user is the legitimate account owner. It does this by generating risk and trust signals to calculate the likelihood of a malicious request, self-tuning as the number of logins increase for the same set of credentials.

API Security (formerly Neosec) protects all APIs, alerts teams to API vulnerabilities, analyzes runtime API interactions for abnormal, suspicious, and malicious behavior, and enables real-time threat response and vulnerability remediation.

API Security (formerly Noname Security) is a cloud-based security platform built on AWS infrastructure, systems, and service offerings that discovers security threats and external activities for APIs used within a customer's environment. API Security (formerly Noname Security) allows customers to deploy, manage, and maintain APIs within their environment to meet security and alerting needs. The platform provides analysis of APIs and user behavior to detect vulnerabilities and prevent breaches from data leakage, authorization issues, abuse, misuse, and data corruption without agents or network modifications.

Client-Side Protection & Compliance (formerly known as Page Integrity Manager) is a behavioral detection technology for web apps that catalogs JavaScript resources and identifies suspicious and malicious script behaviors. It then notifies security teams with actionable insight, empowering them to rapidly understand, and act on the threats. Client-Side Protection & Compliance it itself PCI DSS compliant and it may also be used by customers to help satisfy their obligations under Requirements 6.4.3 and 11.6.1 of PCI DSS 4.0.0, including managing



script inventory, ensuring authorization and integrity of scripts in web applications, and the detection of and response to unauthorized changes to payment pages, respectively, provided that Client-Side Protection & Compliance is configured appropriately in the customers' environment in a manner that their PCI DSS qualified security assessors agree is appropriate under the circumstances.

Audience Hijacking Protector is a key security product for client-side web application protection against unwanted activity from client side plug-ins, browser extensions, and malware. Detecting and mitigating these types of interactions empowers our customers to protect their user journey, preventing users from being redirected to competing and/or malicious websites, reducing shopping cart abandonment rates, curbing fraudulent affiliate activities, and mitigating additional security and privacy risks. As a result, Audience Hijacking Protector will not only improve enduser experiences, but also improve key customer metrics (e.g., conversions, bounce rate, AOV), all while making the web safer for end-users.

Cloud Computing Solutions

Akamai offers a variety of cloud computing solutions. The following virtual machine hosting services are included in Akamai's current PCI DSS assessment: Dedicated CPU, Shared CPU, and High Memory. For more information about these solutions and the responsibilities of customers to ensure they are used in a PCI DSS compliant manner, please see our Responsibility Matrix and Customer Configuration Guide for our cloud computing services.

Network and Infrastructure Security Solutions

Secure Internet Access (f/k/a Enterprise Threat Protector) (SIA Enterprise) is Akamai's PCI DSS compliant, cloud-based security solution that enables an organization to defend against advanced threats such as phishing, malware, ransomware, and DNS-based data exfiltration. As part of its Secure Web Gateway offering, SIA lets customers set up a proxy that performs URL filtering and anti-malware scanning on user traffic. The proxy acts as a man-in-the-middle that intercepts SSH/TLS traffic. A certificate generated in SIA or signed by your organization's Certificate Authority (CA) establishes trust between the client and proxy, and further allows Akamai to create a short-lived, dynamically generated certificate that's used to communicate with the destination server.

SIA Proxy inspects the URL path of requests and checks if a URL is a known threat. If it is a threat, the threat is handled based on the policy action that's assigned in an SIA policy. SIA proxy also performs payload analysis to determine whether websites contain malicious content.



Akamai's Prolexic DDoS mitigation solutions are not included in Akamai's PCI DSS assessment but are designed to have no access to or impact on cardholder data, and are therefore readily available to protect customers and their PCI DSS compliant Internet properties from attacks.

Enterprise Security Solutions

Akamai Guardicore Segmentation (AGS) is a microsegmentation solution designed to limit user access to only applications that are authorized to communicate with each other, significantly reducing the threat surface and risk exposure to the spread of malware.

Akamai's Enterprise Application Access (EAA) provides the infrastructure for customers to operate a "Zero-Trust" model for remotely accessing their corporate IT resources that neither stores nor processes cardholder data and has no ability to access customer application data streams. While EAA is not included in Akamai's PCI DSS assessment, services have been reviewed by a Qualified Security Assessor (QSA) and have been determined to be acceptable to use in customers' cardholder data environments.

Non-Compliant Services

Other Akamai services, such as the NetStorage network for storing large files, the legacy FreeFlow CDN, which is intended for traffic containing less sensitive data, Identity Cloud, EdgeKV, and Standard TLS solutions, are not in scope for Akamai's PCI DSS assessment. Customers must configure their properties to avoid using these services in their cardholder data environments.

Customer Responsibilities

While the products and services described above may be configured to be PCI DSS compliant, customers are required to configure the PCI DSS compliant portions of their web properties properly in accordance with Akamai's Responsibility Matrix, described below. Customers may also request a copy of our PCI DSS Customer Configuration Guide for suggestions about how to configure their properties in a PCI DSS compliant manner.

Additional Notes

The cover page of the Attestation of Compliance is dated "August 2023." This is the
effective date of the PCI DSS version 4.0 standard and not the date of the relevant
AoCs.



- In addition to the Attestation of Compliance, we have also published, at
 https://www.akamai.com/compliance,
 Responsibility Matrices all of Akamai's PCI DSS-compliant solutions. These documents spell out the PCI DSS requirements in detail, and indicates whether Akamai or its customers are to be responsible for satisfying each requirement in order to be compliant. The Responsibility Matrices were reviewed by our PCI DSS assessors in this form, and Akamai is unable to make any modifications.
- Our customers' account and professional service teams can offer general guidance as to how our solutions may be configured for compliance, but the ultimate determination of whether a solution is compliant with PCI DSS will be made by our customers and their Qualified Security Assessors.





Payment Card Industry Data Security Standard

Attestation of Compliance for Report on Compliance – Service Providers

Version 4.0

Revision 2

Publication Date: August 2023



PCI DSS v4.0 Attestation of Compliance for Report on Compliance – Service Providers

Entity Name: Akamai Technologies, Inc.

Assessment End Date: October 31, 2024

Date of Report as noted in the Report on Compliance: October 31, 2024



Section 1: Assessment Information

Instructions for Submission

This Attestation of Compliance (AOC) must be completed as a declaration of the results of the service provider's assessment against the *Payment Card Industry Data Security Standard (PCI DSS) Requirements and Testing Procedures* ("Assessment"). Complete all sections. The service provider is responsible for ensuring that each section is completed by the relevant parties, as applicable. Contact the entity(ies) to which this AOC will be submitted for reporting and submission procedures.

This AOC reflects the results documented in an associated Report on Compliance (ROC). Associated ROC sections are noted in each AOC Part/Section below.

Capitalized terms used but not otherwise defined in this document have the meanings set forth in the PCI DSS Report on Compliance Template.

Part 1. Contact Information		
Part 1a. Assessed Entity (ROC Section 1.1)		
Company name:	Akamai Technologies, Inc. and its direct and indirect subsidiaries	
DBA (doing business as):	N/A	
Company mailing address:	145 Broadway Cambridge, MA 02142	
Company main website:	https://www.akamai.com	
Company contact name:	Mark Carrizosa	
Company contact title:	Director, Information Security	
Contact phone number:	602-653-6614	
Contact e-mail address:	mcarrizo@akamai.com	
Part 1b. Assessor (ROC Section 1.1)		

Provide the following information for all assessors involved in the Assessment. If there was no assessor for a given assessor type, enter Not Applicable.

PCI SSC Internal Security Assessor(s)		
ISA name(s):	Not applicable.	
Qualified Security Assessor		
Company name:	Specialized Security Services, Inc.	
Company mailing address:	4975 Preston Park Boulevard, Suite 510 Plano, TX 75093	
Company website:	https://www.s3security.com	



Lead Assessor name:	Clark Rahman
Assessor phone number:	+1 972 378 5554 x406
Assessor e-mail address:	cbrahman@s3security.com
Assessor certificate number:	QSA, 206-217
Part 2. Executive Summary	

Part 2a. Scope Verification

Services that were **INCLUDED** in the scope of the Assessment (select all that apply):

Name of service(s) assessed:

Akamai's services that may be used in a PCI DSS compliant manner include the following:

- Secure CDN with Enhanced TLS (the "Secure CDN");
- Content Delivery products such as Ion, Dynamic Site Accelerator, API Acceleration, and Adaptive Media Delivery, when running on the Secure CDN;
- EdgeWorkers, when running on the Secure CDN;
- mPulse digital performance management services;
- App and API security products such as App & API Protector (including the Malware Protection add-on), Account Protector, Kona Site Defender, API Gateway, Cloudlets, and Bot Manager (Standard and Premier), when running on the Secure CDN;
- NoName API Security (formerly Noname Security);
- API Security (formerly Neosec);
- Client-Side Protection & Compliance;
- Audience Hijacking Protector;
- Secure Internet Access Enterprise (f/k/a Enterprise Threat Protector);
- Akamai MFA; and
- Akamai Guardicore Segmentation

Type of service(s) assessed:		
Hosting Provider:	Managed Services:	Payment Processing:
☐ Applications / software	☐ Systems security services	☐ POI / card present
☐ Hardware	☐ IT support	☐ Internet / e-commerce
☐ Infrastructure / Network	☐ Physical security	☐ MOTO / Call Center
☐ Physical space (co-location)	☐ Terminal Management System	☐ ATM
☐ Storage	☐ Other services (specify):	☐ Other processing (specify):
☐ Web-hosting services		
☐ Security services		
☐ 3-D Secure Hosting Provider		
☐ Multi-Tenant Service Provider		
☐ Other Hosting (specify):		
Account Management	☐ Fraud and Chargeback	☐ Payment Gateway/Switch



☐ Back-Office Services	☐ Issuer Processing	☐ Prepaid Services			
☐ Billing Management	☐ Loyalty Programs	☐ Records Management			
☐ Clearing and Settlement	☐ Merchant Services ☐ Tax/Government Payment				
☐ Network Provider					
☑ Others (specify): Akamai Technologies, Inc.'s customers are instructed that only those solutions listed Part 2a above are in scope for this PCI assessment.					
Note: These categories are provided for assistance only and are not intended to limit or predetermine an entity's service description. If these categories do not apply to the assessed service, complete "Others." If it is not clear whether a category could apply to the assessed service, consult with the entity(ies) to which this AOC will be submitted.					



Part 2. Executive Summary (continued) Part 2a. Scope Verification (continued) Services that are provided by the service provider but were NOT INCLUDED in the scope of the Assessment (select all that apply): Content Delivery Network (Non-Secure), including Secure Content Name of service(s) not assessed: Delivery Network with Standard TLS, NetStorage, Prolexic DDoS mitigation services, Edge DNS, Enterprise Application Access (EAA), other services that do not interact with cardholder data. Type of service(s) not assessed: **Hosting Provider: Managed Services: Payment Processing:** ☐ Applications / software ☐ Systems security services ☐ POI / card present ☐ Hardware ☐ IT support ☐ Internet / e-commerce ☐ Infrastructure / Network MOTO / Call Center ☐ Physical security ☐ Physical space (co-location) ☐ Terminal Management System \square ATM ☐ Other services (specify): ☐ Other processing (specify): ☐ Storage ☐ Web-hosting services ☐ Security services ☐ 3-D Secure Hosting Provider ☐ Multi-Tenant Service Provider ☐ Other Hosting (specify): ☐ Account Management ☐ Fraud and Chargeback ☐ Payment Gateway/Switch ☐ Back-Office Services ☐ Issuer Processing ☐ Prepaid Services ☐ Billing Management ☐ Loyalty Programs ☐ Records Management ☐ Clearing and Settlement ☐ Tax/Government Payments ☐ Network Provider ☐ Others (specify): Content Delivery Network (Non-Secure) Provide a brief explanation why any checked services Akamai instructs all clients who may transmit were not included in the Assessment: managed cardholder data to use the Akamai Secure Content Delivery Network with Enhanced TLS. Part 2b. Description of Role with Payment Cards (ROC Section 2.1) Describe how the business stores, processes, and/or Akamai Technologies, Inc.'s customers are instructed transmits account data. that only those solutions listed in Part 2a above are in scope for this PCI assessment.



The Akamai Secure Content Delivery Network with Enhanced TLS is Akamai's secure platform on which its web performance and web security services may be used on Internet properties that transmit sensitive information, including cardholder data. Within the Akamai Secure Content Delivery Network with Enhanced TLS, Akamai transports the original webbased information across Akamai's EdgeSuite SSL ("ESSL") network using TLS. This data is then staged on an ESSL endpoint where it is presented to the requesting browser. These services and related products, when running on the Akamai Secure Content Delivery Network with Enhanced TLS in accordance with Responsibility Matrix required by PCI DSS requirement 12.8.5, may be used in customers' cardholder data environment in a manner consistent with the requirements of PCI DSS.

These services, such as Ion, App & API Protector, and related products, when running on the Akamai Secure Content Delivery Network with Enhanced TLS in accordance with the Responsibility Matrix required by PCI DSS requirement 12.8.5, may be used in customers' cardholder data environment in a manner consistent with the requirements of PCI DSS.

Akamai Technologies, Inc. provides the Bot Manager Premier and Account Protector solutions to clients wishing to purchase and utilize said services. The Bot Manager Premier and Account Protector solutions provide robust, secure, and scalable solutions that enable advanced bot detection, analytics, and mitigation capabilities for their customers.

Bot Manager is a product designed to detect automated traffic generated by robots (a.k.a "bots") on Akamai's customer web sites. The product uses several methods in order to detect and categorize bots, and any of the detection categories could be run on requests that have cardholder data. The cardholder data is not extracted or used as part of any of the bot detection processes.

Account Protector (APR) gathers behavioral signals combined with information on user devices and originating networks to construct a true user profile. The true user profile is used in conjunction with other Akamai defined risk factors related to the source to continuously verify and assess the risk of a user throughout the entire session. Account Protector is sold as an additional service with Bot Manager Premier.

Akamai Technologies, Inc.'s, Bot Manager Premier and Account Protector solutions interact with customer data and transmit using encryption and industry leading cryptographic management on behalf of their clients. The Account Protector solution as part of the analysis



stores data which may include customer cardholder information if used as a unique identifier.

Bot Manager Premier and Account Protector leverage some connections to systems from the Akamai Secure Content Delivery Network with Enhanced TLS (SCDN) and Akamai's EdgeSuite SSL ("ESSL") network using TLS.

Client-Side Protection & Compliance is used for identifying anomalies and providing management and reporting capabilities purpose-built to meet PCI DSS 4.0 requirements for payment web pages and applications.

Audience Hijacking Protector is a key security product for client-side web application protection against unwanted activity from client-side plug-ins, browser extensions, and malware. Detecting and mitigating these types of interactions empowers our customers to protect their user journey, preventing users from being redirected to competing and/or malicious websites, reducing shopping cart abandonment rates, curbing fraudulent affiliate activities, and mitigating additional security and privacy risks. As a result, Audience Hijacking Protector will not only improve end-user experiences, but also improve key customer metrics (e.g., conversions, bounce rate, AOV), all while making the web safer for end-users.

Akamai MFA is a multi-factor cloud-based authentication solution that operates on the Akamai Intelligent Edge Platform. Akamai MFA supports FIDO2 authentication standards providing customers with strong cryptographic protection against unauthorized access and provides customers with additional control over their identity and access management responsibilities.

Secure Internet Access Enterprise (f/k/a Enterprise Threat Protector) is a cloud-based, targeted threat protection solution that safeguards organizations from DNS and web-based threats, enforces authentication and acceptable use policies, and audits user Internet access.

Malware Protection is a new feature within the environment that is an add on to the existing App and API Protector products. This feature provides Akamai's customers the ability to scan their file uploads for malware. File uploads may contain cardholder data that is temporarily cached in a secure ghost store at the edge, and therefore is in scope for the assessment. Secure encryption is in use; the key is deleted and encrypted data is not accessible once scanning is complete.

Akamai's EAA service has no access to customers' cardholder data if configured per the Customer Configuration Guide and is therefore out of scope for this



	PCI assessment. This service is nevertheless acceptable to use in customers' cardholder data environments.
	Additional Akamai services, such as Prolexic DDoS mitigation services and IP Accelerator content delivery service, have no access to customers' cardholder data and are therefore out of scope for this PCI assessment. These services are nevertheless acceptable to use in customers' cardholder data environments.
	No other systems are intended or should be used for the transmission, processing, or the storage of cardholder data.
Describe how the business is otherwise involved in or has the ability to impact the security of its customers' account data.	Not applicable.
Describe system components that could impact the security of account data.	Not applicable.



Part 2. Executive Summary (continued)

Part 2c. Description of Payment Card Environment

Provide a high-level description of the environment covered by this Assessment.

For example:

- Connections into and out of the cardholder data environment (CDE).
- Critical system components within the CDE, such as POI devices, databases, web servers, etc., and any other necessary payment components, as applicable.
- System components that could impact the security of account data.

Secure CDN with Enhanced TLS

Akamai's Secure CDN is the core component of its PCI compliant content delivery services. The servers in this network are physically secured against intrusion while being widely distributed around the globe to ensure availability and maximize origin offload. The Secure CDN also provides customers with custom TLS certificates with the flexibility to configure them to satisfy various security and business requirements. The Secure CDN is not typically sold as an independent service but is instead a feature included with most of Akamai's web performance and cloud security products, as described below.

Content Delivery Solutions

Akamai's content delivery solutions, including lon and such legacy CDN solutions as Terra Alta or Dynamic Site Delivery, typically have the option of having their content delivered securely, in which case that content is delivered via the Secure CDN, and may be used in a PCI DSS compliant manner. Additional products, such as mPulse digital performance management, Cloudlets, and dynamic content delivery options such as adaptive image compression and prefetching options, have all been designed to work on Akamai's Secure CDN servers, and may be configured to be fully compliant with PCI DSS.

Edge Computing Solutions

The Akamai EdgeWorkers solution, which enables customers (developers) to create their own services using JavaScript and deploy them across our Secure CDN, is included in Akamai's PCI DSS assessment and may be used in a manner fully compliant with PCI DSS.

The Akamai EdgeKV distributed key value store is not PCI DSS compliant, however. Please see "Non-Compliant Services" below for more information.

App and API Security Solutions

As with the above content delivery solutions, Akamai's App & API Protector (including the Malware Protection add-on), Kona Site Defender, Account Protector, and Bot Manager



application as well as API security products may be configured to operate over the Secure CDN in a PCI DSS compliant manner.

In addition, the web application firewall (WAF) components of App & API Protector, Kona Site Defender, and Web Application Protector may be used by customers to help satisfy their obligations under Requirements 6.4.1 and 6.4.2 of PCI DSS 4.0.0, all of which encourage the use of a WAF, provided that the WAF is configured appropriately in the customers' environment in a manner that their PCI DSS qualified security assessors agree is appropriate under the circumstances.

Bot Manager provides advanced bot detections designed to detect and mitigate the most sophisticated bots, like those typically seen in use cases such as credential abuse, inventory hoarding, gift card balance checking, and other forms of web fraud. Bot Manager's unmatched detections and mitigation capabilities allow automated operations to run more effectively and safely.

Account Protector is designed to prevent account takeover and human fraudulent activity by detecting during the authentication process whether a human user is the legitimate account owner. It does this by generating risk and trust signals to calculate the likelihood of a malicious request, self-tuning as the number of logins increases for the same set of credentials.

API Security (formerly Noname Security) is a cloud-based security platform built on AWS infrastructure, systems, and service offerings that discovers security threats and external activities for APIs used within a customer's environment. API Security (formerly Noname Security) allows customers to deploy, manage, and maintain APIs within their environment to meet security and alerting needs. The platform provides analysis of APIs and user behavior to detect vulnerabilities and prevent breaches from data leakage, authorization issues, abuse, misuse, and data corruption without agents or network modifications. API Security (formerly Noname Security) leverages the following systems and services to deploy the product: AWS Services; EC2, Containers, Linux Servers; Virtual firewall rules; Centralized logging tools;



Configuration management tools; IDS/IPS systems; File integrity monitoring; Administrator Workstations.

API Security (formerly Neosec) protects all APIs, alerts teams to API vulnerabilities, analyzes runtime interactions for abnormal, suspicious, and malicious behavior, and enables real-time threat response and vulnerability remediation.

Client-Side Protection & Compliance (formerly known as Page Integrity Manager) is a behavioral detection technology for web apps that catalogs JavaScript resources and identifies suspicious and malicious script behaviors. It then notifies security teams with actionable insight, empowering them to rapidly understand, and act on the threats. Client-Side Protection & Compliance it itself PCI DSS compliant and it may also be used by customers to help satisfy their obligations under Requirements 6.4.3 and 11.6.1 of PCI DSS 4.0.0, including managing script inventory, ensuring authorization and integrity of scripts in web applications, and the detection of and response to unauthorized changes to payment pages, respectively, provided that Client-Side Protection & Compliance is configured appropriately in the customers' environment in a manner that their PCI DSS qualified security assessors agree is appropriate under the circumstances.

Audience Hijacking Protector is a key security product for client-side web application protection against unwanted activity from client-side plugins, browser extensions, and malware. Detecting and mitigating these types of interactions empowers our customers to protect their user journey, preventing users from being redirected to competing and/or malicious websites. reducing shopping cart abandonment rates, curbing fraudulent affiliate activities, and mitigating additional security and privacy risks. As a result, Audience Hijacking Protector will not only improve end-user experiences, but also improve kev customer metrics (e.g., conversions, bounce rate, AOV), all while making the web safer for end-users.

Indicate whether the environment includes segmentation to reduce the scope of the	☐ No
Assessment.	
(Refer to the "Segmentation" section of PCI DSS for guidance on segmentation)	



Part 2d. In-Scope Locations/Facilities (ROC Section 4.6)

List all types of physical locations/facilities (for example, corporate offices, data centers, call centers and mail rooms) in scope for this Assessment.

Facility Type	Total Number of Locations (How many locations of this type are in scope)	Location(s) of Facility (city, country)	
Example: Data centers	3	Boston, MA, USA	
Corporate Office	1	Cambridge, MA, USA	
Data Center	1	Billerica, MA, USA	
Data Center	1	Chicago, IL, USA	
Data Center		Global	



Part 2. Executive Summary (continued)

Part 2e. PCI SSC Validated Products and Solutions (ROC Section 3.3)

Does the e	entity use any item identified on any PCI SSC Lists of Validated Products and Solutions*?
☐ Yes	⊠ No

Provide the following information regarding each item the entity uses from PCI SSC's Lists of Validated Products and Solutions:

Name of PCI SSC- validated Product or Solution	Version of Product or Solution	PCI SSC Standard to which Product or Solution Was Validated	PCI SSC Listing Reference Number	Expiry Date of Listing
Not applicable.	Not applicable.	Not applicable.	Not applicable.	Not applicable.

For purposes of this document, "Lists of Validated Products and Solutions" means the lists of validated products, solutions, and/or components appearing on the PCI SSC website (www.pcisecuritystandards.org)—for example, 3DS Software Development Kits, Approved PTS Devices, Validated Payment Software, Payment Applications (PADSS), Point to Point Encryption (P2PE) solutions, Software-Based PIN Entry on COTS (SPoC) solutions, and Contactless Payments on COTS (CPoC) solutions.



Part 2f. Third-Party Service Providers (ROC Section 4.4) For the services being validated, does the entity have relationships with one or more third-party service providers that: ☐ Yes ☐ No Store, process, or transmit account data on the entity's behalf (for example, payment gateways, payment processors, payment service providers (PSPs, and off-site storage)) ☐ Yes ☐ No Manage system components included in the entity's Assessment (for example, via network security control services, anti-malware services, security incident and event management (SIEM), contact and call centers, web-hosting companies, and laaS, PaaS, SaaS, and FaaS cloud providers) ☐ Yes ☐ No Could impact the security of the entity's CDE (for example, vendors providing support via remote access, and/or bespoke software developers). If Yes: Name of Service Provider: **Description of Services Provided:** Not applicable. Not applicable. Note: Requirement 12.8 applies to all entities in this list.



Part 2. Executive Summary (continued)

Part 2g. Summary of Assessment (ROC Section 1.8.1)

Indicate below all responses provided within each principal PCI DSS requirement.

For all requirements identified as either "Not Applicable" or "Not Tested," complete the "Justification for Approach" table below.

Note: One table to be completed for each service covered by this AOC. Additional copies of this section are available on the PCI SSC website.

Name of Service Assessed: Secure Content Delivery Network with Enhanced TLS, JavaScript engines for Bot Manager Premier, mPulse, Page Integrity Manager, and NoName API Security

PCI DSS Requirement		Requireme one response m ment. Indicate a	Select If Below Method(s) Was Used			
•	In Place	Not Applicable	Not Tested	Not in Place	Customized Approach	Compensating Controls
Requirement 1:	\boxtimes					
Requirement 2:	\boxtimes					
Requirement 3:	\boxtimes	\boxtimes				
Requirement 4:	\boxtimes	\boxtimes				
Requirement 5:	\boxtimes	\boxtimes				
Requirement 6:	\boxtimes	\boxtimes				
Requirement 7:	\boxtimes	\boxtimes				
Requirement 8:	\boxtimes	\boxtimes				
Requirement 9:	\boxtimes	\boxtimes				
Requirement 10:	\boxtimes	\boxtimes				
Requirement 11:	\boxtimes	\boxtimes				
Requirement 12:	\boxtimes	\boxtimes				
Appendix A1:	\boxtimes					
Appendix A2:		\boxtimes				
Justification for Approach						



For any Not Applicable responses, identify which subrequirements were not applicable and the reason.

- 1.3.3: Wireless networks are not used within the architecture.
- 1.4.1: Access to untrusted networks is not possible as firewall devices are configured to manager and limit traffic to authorized systems.
- 1.4.2: Inbound traffic is limited to only system components that provide authorized publicly accessible services, protocols, and ports.
- 1.4.4: Akamai SCDN does not store, process, or transmit CHD/SAD, nor does a possibility of exposure exist.
- 1.5.1: Akamai SCDN systems have no portable computing devices.
- 2.3.1: S3 examined the documentation provided and interviewed team members to determine wireless environments are not connected to the CDE nor transmitting account data.
- 2.3.2: S3 examined the documentation provided and interviewed team members to determine wireless environments are not connected to the CDE nor transmitting account data.
- 3.3.1 3.3.2: Systems do not store SAD.
- 3.3.3: Akamai Technologies, Inc. is not an issuer.
- 3.4.1: PAN is not stored, processed, or transmitted.
- 3.5.1 3.5.1.3: No PAN is stored on any system within Akamai SCDN.
- 3.7.6: No manual clear-text cryptographic keymanagement operations are in use as all cryptographic keys are auto generated by the Vault systems.
- 3.7.9: No cryptographic keys are shared with customers.
- 4.2.1.1, 5.2.3.1, 5.3.2.1, 5.3.3, 5.4.1, 6.3.2, 7.2.5, 7.2.5.1, 8.3.6, 8.3.10.1, 8.6.1, 8.6.2, 8.6.3, 10.4.1.1, 10.4.2.1, 10.7.1 10.7.3, 11.3.1.1, 11.3.1.2, 11.4.7, 11.5.1.1, 11.6.1, 12.3.1, 12.3.2, 12.5.2.1, 12.5.3, 12.6.2, 12.6.3.1, 12.6.3.2, 12.10.4.1, A1.1.4, A1.2.3: Not applicable. This requirement is best practice until 31 March 2025 and was not assessed during this assessment period.
- 4.2.1.2: Wireless networks are not used to transmit PAN nor is connected to the CDE.
- 4.2.2: End-user messaging technologies is not used to transmit PAN within the SCDN environment.
- 6.4.3: Payment pages and scripts are not used within the SCDN environment as payments are not collected.
- 7.2.6: Akamai SCDN systems do not have access to any cardholder data.
- 9.2.2: There are no publicly accessible network jacks on Akamai premises.
- 9.4.1.1, 9.4.1.2: Akamai SCDN does not store cardholder data.
- 9.4.3 9.4.7: Akamai SCDN does not store cardholder data.



	9.5.1 - 9.5.1.3: Akamai SCDN does not have any POI devices that capture payment data via direct physical interaction.
	11.2.1: Akamai SCDN does not maintain wireless systems within productions networks. Corporate networks do not have the ability to access production networks resulting from strict preventative physical and logical access controls.
	11.2.2: Akamai SCDN does not maintain wireless systems within productions networks. Corporate networks do not have the ability to access production networks resulting from strict preventative physical and logical access controls. Appendix A2: SSL/Early TLS is not in use.
	Appendix E: Customized approach is not in use.
For any Not Tested responses, identify which sub- requirements were not tested and the reason.	Not applicable.



Interactive testing

• Other: Not applicable.

Section 2 Report on Compliance

(ROC Sections 1.2 and 1.3.2) Date Assessment began: 2024-04-01 Note: This is the first date that evidence was gathered, or observations were made. Date Assessment ended: 2024-10-31 Note: This is the last date that evidence was gathered, or observations were made. ☐ Yes ☒ No Were any requirements in the ROC unable to be met due to a legal constraint? Were any testing activities performed remotely? If yes, for each testing activity below, indicate whether remote assessment activities were performed: ☐ No Examine documentation ☐ No Interview personnel ☑ No Examine/observe live data ☐ Yes Observe process being performed ☐ No ☐ Yes ⊠ No Observe physical environment

☐ Yes

☐ Yes

No

☐ No



Section 3 Validation and Attestation Details

Part 3. PCI DSS Validation (ROC Section 1.7)

This 2024		in the ROC dated (Date of Report as noted in the ROC October 31,				
⊠ Fι	·	PCI DSS assessment was completed: ts have been assessed and therefore no requirements were marked				
☐ Partial Assessment – One or more requirements have not been assessed and were therefore marked as Not Tested in the ROC. Any requirement not assessed is noted as Not Tested in Part 2g above.						
as ap		ne ROC noted above, each signatory identified in any of Parts 3b-3d, compliance status for the entity identified in Part 2 of this document				
	Compliant: All sections of the PCI DSS ROC are complete, and all assessed requirements are marked as being either In Place or Not Applicable, resulting in an overall COMPLIANT rating; thereby <i>Akamai Technologies, Inc.</i> has demonstrated compliance with all PCI DSS requirements except those noted as Not Tested above.					
	Non-Compliant: Not all sections of the PCI DSS ROC are complete, or one or more requirements are marked as Not in Place, resulting in an overall NON-COMPLIANT rating; thereby (Service Provider Company Name) has not demonstrated compliance with PCI DSS requirements.					
	Target Date for Compliance: YYYY-MM-DD					
	An entity submitting this form with a Non-Compliant status may be required to complete the Action Plan in Part 4 of this document. Confirm with the entity to which this AOC will be submitted before completing Part 4.					
	Compliant but with Legal exception: One or more assessed requirements in the ROC are marked as Not in Place due to a legal restriction that prevents the requirement from being met and all other assessed requirements are marked as being either In Place or Not Applicable, resulting in an overall COMPLIANT BUT WITH LEGAL EXCEPTION rating; thereby (Service Provider Company Name) has demonstrated compliance with all PCI DSS requirements except those noted as Not Tested above or as Not in Place due to a legal restriction.					
	This option requires additional review from the entity to which this AOC will be submitted.					
	If selected, complete the following:					
	Affected Requirement	Details of how legal constraint prevents requirement from being met				



Part 3. PCI DSS Validation (continued) Part 3a. Service Provider Acknowledgement Signatory(s) confirms: (Select all that apply) The ROC was completed according to PCI DSS, Version 4.0 and was completed according to the instructions therein. \boxtimes All information within the above-referenced ROC and in this attestation fairly represents the results of the Assessment in all material respects. \boxtimes PCI DSS controls will be maintained at all times, as applicable to the entity's environment. Part 3b. Service Provider Attestation Signature of Service Provider Executive Officer 1 Date: October 31, 2024 Service Provider Executive Officer Name: Mark Carrizosa Title: Director, Information Security Part 3c. Qualified Security Assessor (QSA) Acknowledgement If a QSA was involved or assisted with this ☑ QSA performed testing procedures. Assessment, indicate the role performed: ☐ QSA provided other assistance. If selected, describe all role(s) performed: Clark Rahman Signature of Lead QSA 1 Date: October 31, 2024 Lead QSA Name: Clark Rahman Hank Edley Signature of Duly Authorized Officer of QSA Company ↑ Date: October 31, 2024 QSA Company: EVP, Cybersecurity Duly Authorized Officer Name: Hank Edley Services Part 3d. PCI SSC Internal Security Assessor (ISA) Involvement If an ISA(s) was involved or assisted with this ☐ ISA(s) performed testing procedures. Assessment, indicate the role performed: ☐ ISA(s) provided other assistance. If selected, describe all role(s) performed:



Part 4. Action Plan for Non-Compliant Requirements

Only complete Part 4 upon request of the entity to which this AOC will be submitted, and only if the Assessment has Non-Compliant results noted in Section 3.

If asked to complete this section, select the appropriate response for "Compliant to PCI DSS Requirements" for each requirement below. For any "No" responses, include the date the entity expects to be compliant with the requirement and provide a brief description of the actions being taken to meet the requirement.

PCI DSS Requirement	Description of Requirement	Compliant to PCI DSS Requirements (Select One)		Remediation Date and Actions (If "NO" selected for any
		YES	NO	Requirement)
1	Install and maintain network security controls			
2	Apply secure configurations to all system components			
3	Protect stored account data			
4	Protect cardholder data with strong cryptography during transmission over open, public networks			
5	Protect all systems and networks from malicious software			
6	Develop and maintain secure systems and software			
7	Restrict access to system components and cardholder data by business need to know			
8	Identify users and authenticate access to system components			
9	Restrict physical access to cardholder data			
10	Log and monitor all access to system components and cardholder data			
11	Test security systems and networks regularly			
12	Support information security with organizational policies and programs			
Appendix A1	Additional PCI DSS Requirements for Multi- Tenant Service Providers			
Appendix A2	Additional PCI DSS Requirements for Entities using SSL/early TLS for Card-Present POS POI Terminal Connections			













Payment Card Industry Data Security Standard



Attestation of Compliance for Report on Compliance – Service Providers

Version 4.0

Revision 2

Publication Date: August 2023



PCI DSS v4.0 Attestation of Compliance for Report on Compliance – Service Providers

Entity Name: Akamai Technologies, Inc.

Assessment End Date: May 1, 2024

Date of Report as noted in the Report on Compliance: June 30, 2024



Section 1: Assessment Information

Instructions for Submission

This Attestation of Compliance (AOC) must be completed as a declaration of the results of the service provider's assessment against the *Payment Card Industry Data Security Standard (PCI DSS) Requirements and Testing Procedures ("*Assessment"). Complete all sections. The service provider is responsible for ensuring that each section is completed by the relevant parties, as applicable. Contact the entity(ies) to which this AOC will be submitted for reporting and submission procedures.

This AOC reflects the results documented in an associated Report on Compliance (ROC). Associated ROC sections are noted in each AOC Part/Section below.

Capitalized terms used but not otherwise defined in this document have the meanings set forth in the PCI DSS Report on Compliance Template.

Part 1. Contact Information				
Part 1a. Assessed Entity (ROC Section 1.1)				
Company name:	Akamai Technologies, Inc. and its direct and indirect subsidiaries			
DBA (doing business as):	N/A			
Company mailing address:	145 Broadway Cambridge, MA 02142			
Company main website:	https://www.akamai.com			
Company contact name:	Mark Carrizosa			
Company contact title:	Director, Information Security			
Contact phone number:				
Contact e-mail address:	o@akamai.com			

Provide the following information for all assessors involved in the Assessment. If there was no assessor for a given assessor type, enter Not Applicable.

PCI SSC Internal Security Assessor(s)			
ISA name(s):	Not applicable.		
Qualified Security Assessor			
Company name:	Specialized Security Services, Inc.		
Company mailing address:	4975 Preston Park Boulevard, Suite 510 Plano, TX 75093		



Company website:	https://www.s3security.com					
Lead Assessor name:	Clark Rahman					
Assessor phone number:						
Assessor e-mail address:	n@s3security.com					
Assessor certificate number:	QSA, 206-217					
Part 2. Executive Summary						
Part 2a. Scope Verification						
Services that were <u>INCLUDED</u> in the	scope of the Assessment (select all	that apply):				
Name of service(s) assessed:	Akamai Technologies, Inc. acquired Linode Limited Liability Company in 2022. Akamai is in the process of adapting and expanding the cloud computing services acquired from Linode to be used for both Akamai's internal workloads and as a critical part of the Akamai Connected Cloud, through which Akamai now provides a variety of cloud computing services. Akamai's cloud computing services provide delivery of resources and services over the internet to offer faster innovation, flexible resources, and economies of scale. Akamai offers a variety of cloud computing solutions. The Object Storage solution, as well as the following virtual machine hosting services are included in Akamai's current PCI DSS assessment: Dedicated CPU, Shared CPU, and High Memory.					
Type of service(s) assessed:						
Hosting Provider:	Managed Services:	Payment Processing:				
 Applications / software Hardware Infrastructure / Network Physical space (co-location) Storage Web-hosting services Security services 3-D Secure Hosting Provider Multi-Tenant Service Provider Other Hosting (specify): 	☐ Systems security services ☐ IT support ☐ Physical security ☐ Terminal Management System ☐ Other services (specify):	☐ POI / card present ☐ Internet / e-commerce ☐ MOTO / Call Center ☐ ATM ☐ Other processing (specify):				
Account Management	☐ Fraud and Chargeback	☐ Payment Gateway/Switch				
☐ Back-Office Services	☐ Issuer Processing	☐ Prepaid Services				
☐ Billing Management	☐ Loyalty Programs	☐ Records Management				
☐ Clearing and Settlement	☐ Merchant Services	☐ Tax/Government Payments				
☐ Network Provider	I.	I				



☑ Others (specify): Akamai Technologies, Inc.'s customers are instructed that only those solutions listed in Part 2a above are in scope for this PCI assessment.

Note: These categories are provided for assistance only and are not intended to limit or predetermine an entity's service description. If these categories do not apply to the assessed service, complete "Others." If it is not clear whether a category could apply to the assessed service, consult with the entity(ies) to which this AOC will be submitted.



Part 2. Executive Summary (continued) Part 2a. Scope Verification (continued) Services that are provided by the service provider but were NOT INCLUDED in the scope of the Assessment (select all that apply): Name of service(s) not assessed: All of Akamai's content delivery and security services are not assessed here. Many of these services are, however, covered by additional Attestations of Compliance. The following customer-facing tools, while not included in this assessment, are nevertheless acceptable to use in a customers' cardholder data environment: Stackscripts and Marketplace Apps, VLANs, Longview, and Network Helper. The following Akamai cloud computing services are not in the scope of this assessment: Kubernetes, GPU, Node Balancers, block storage, and databases. Type of service(s) not assessed: **Hosting Provider: Managed Services: Payment Processing:** ☐ Applications / software ☐ Systems security services ☐ POI / card present ☐ Hardware ☐ IT support ☐ Internet / e-commerce ☐ Infrastructure / Network ☐ Physical security ☐ Physical space (co-location) ☐ Terminal Management System \square ATM ☐ Storage Other services (specify): ☐ Other processing (specify): ☐ Security services ☐ 3-D Secure Hosting Provider ☐ Other Hosting (specify): ☐ Account Management ☐ Fraud and Chargeback ☐ Payment Gateway/Switch ☐ Back-Office Services ☐ Issuer Processing ☐ Prepaid Services ☐ Billing Management ☐ Loyalty Programs ☐ Records Management ☐ Clearing and Settlement ☐ Merchant Services ☐ Tax/Government Payments □ Network Provider ☑ Others (specify): Content Delivery Network (Secure and Non-Secure) Provide a brief explanation why any checked services Akamai Compute services defined in section Part were not included in the Assessment: 2a. have been identified as in scope for this assessment. All other services not expressly defined are out of scope for the purposes of this assessment.



Part 2b. Description of Role with Payment Cards (ROC Section 2.1)

Describe how the business stores, processes, and/or transmits account data.	Akamai Compute provides the delivery of computing resources & services over the internet to offer faster innovation, flexible resources, and economies of scale. Providing customers with Infrastructure-as-a-service (IaaS) solutions on a global scale. The IaaS solutions are evaluated for PCI DSS compliance requirements on the basis that customers could host workloads that could process, transmit, store, or impact the security of card holder data and credit card processing. A virtual bin (VBIN) is a customer virtual machine that is not customer-facing. The VBIN may capture sensitive cardholder information, such as cardholder number, if the customer uses the virtual machine for that use. This does not mean the use of Akamai Compute IaaS solutions are automatically compliant, and customers should follow Akamai provided guidance for configuration and responsibilities when hosting workloads that are in scope for the customers PCI compliance.
Describe how the business is otherwise involved in or has the ability to impact the security of its customers' account data.	Not applicable.
Describe system components that could impact the security of account data.	Not applicable.



Part 2. Executive Summary (continued)

Part 2c. Description of Payment Card Environment

Provide a high-level description of the environment covered by this Assessment.

For example:

- Connections into and out of the cardholder data environment (CDE).
- Critical system components within the CDE, such as POI devices, databases, web servers, etc., and any other necessary payment components, as applicable.
- System components that could impact the security of account data.

The Akamai Compute environment is a cloud compute platform that is both customer and internal facing to provide delivery of resources and services over the internet to offer faster innovation, flexible resources, and economies of scale. Customers can utilize a virtual machine or object storage bucket that may capture sensitive information, including cardholder data, however it is the customers responsibility to protect information in accordance with the Customer Configuration Guide and PCI Responsibility Matrix provided to customers.

Indicate whether the environment includes segmentation to reduce the scope of the Assessment.	⊠ Yes	□No
(Refer to the "Segmentation" section of PCI DSS for guidance on segmentation)		

Part 2d. In-Scope Locations/Facilities (ROC Section 4.6)

List all types of physical locations/facilities (for example, corporate offices, data centers, call centers and mail rooms) in scope for this Assessment.

Facility Type	Total Number of Locations (How many locations of this type are in scope)	Location(s) of Facility (city, country)	
Example: Data centers	3	Boston, MA, USA	
Corporate Office	1	Cambridge, MA, USA	
Data Center	1	Dallas, TX, USA	
Data Center	1	Atlanta, GA, USA	
Data Center	1	Newark, NJ, USA	



Part 2. Executive Summary (continued)

Part 2e. PCI SSC Validated Products and Solutions (ROC Section 3.3)

Does the e	entity use any item identified on any PCI SSC Lists of Validated Products and Solutions*?
☐ Yes	⊠ No

Provide the following information regarding each item the entity uses from PCI SSC's Lists of Validated Products and Solutions:

Name of PCI SSC- validated Product or Solution	Version of Product or Solution	PCI SSC Standard to which Product or Solution Was Validated	PCI SSC Listing Reference Number	Expiry Date of Listing
Not applicable.	Not applicable.	Not applicable.	Not applicable.	Not applicable.

For purposes of this document, "Lists of Validated Products and Solutions" means the lists of validated products, solutions, and/or components appearing on the PCI SSC website (www.pcisecuritystandards.org)—for example, 3DS Software Development Kits, Approved PTS Devices, Validated Payment Software, Payment Applications (PADSS), Point to Point Encryption (P2PE) solutions, Software-Based PIN Entry on COTS (SPoC) solutions, and Contactless Payments on COTS (CPoC) solutions.



Part 2f. Third-Party Service Providers (ROC Section 4.4)

(ROC Section 4.4)					
For the services being validated, does the entity have relationships with one or more third-party service providers that:					
• •	Store, process, or transmit account data on the entity's behalf (for example, payment gateways, payment processors, payment service providers (PSPs, and off-site storage))				
Manage system components included in the entity's Assessment (for example, via network security control services, anti-malware services, security incident and event management (SIEM), contact and call centers, web-hosting companies, and IaaS, PaaS, SaaS, and FaaS cloud providers) □ Yes □ No					
Could impact the security of the entity's C remote access, and/or bespoke software or control	☐ Yes ⊠ No				
If Yes:					
Name of Service Provider: Description of Services Provided:					
Not applicable. Not applicable.					
Note: Requirement 12.8 applies to all entities in this list.					



Part 2. Executive Summary (continued)

Part 2g. Summary of Assessment (ROC Section 1.8.1)

Indicate below all responses provided within each principal PCI DSS requirement.

For all requirements identified as either "Not Applicable" or "Not Tested," complete the "Justification for Approach" table below.

Note: One table to be completed for each service covered by this AOC. Additional copies of this section are available on the PCI SSC website.

Name of Service Assessed: Akamai Compute

PCI DSS Requirement	Requirement Finding More than one response may be selected for a given requirement. Indicate all responses that apply.				Select If Below Method(s) Was Used	
. roquii oiii oii	In Place	Not Applicable	Not Tested	Not in Place	Customized Approach	Compensating Controls
Requirement 1:	\boxtimes	\boxtimes				
Requirement 2:	\boxtimes	\boxtimes				
Requirement 3:	\boxtimes	\boxtimes				
Requirement 4:	\boxtimes	\boxtimes				
Requirement 5:		\boxtimes				
Requirement 6:		\boxtimes				
Requirement 7:		\boxtimes				
Requirement 8:		\boxtimes				
Requirement 9:		\boxtimes				
Requirement 10:		\boxtimes				
Requirement 11:		\boxtimes				
Requirement 12:		\boxtimes				
Appendix A1:		\boxtimes				
Appendix A2:		\boxtimes				
Justification for Approach						



For any Not Applicable responses, identify which subrequirements were not applicable and the reason.

- 1.3.3, Wireless networks are not used within the architecture.
- 1.4.4, Akamai Compute does not store, process, or transmit CHD/SAD, nor does a possibility of exposure exist.
- 1.5.1, Akamai Compute systems have no portable computing devices.
- 2.3.1, S3 examined the documentation provided and interviewed team members to determine wireless environments are not connected to the CDE nor transmitting account data.
- 2.3.2, S3 examined the documentation provided and interviewed team members to determine wireless environments are not connected to the CDE nor transmitting account data.
- 3.1.1 3.3.2, Systems do not store SAD.
- 3.3.3, Akamai Technologies, Inc. is not an issuer.
- 3.4.1, PAN is not stored, processed, or transmitted.
- 3.4.2, Akamai Compute does not transmit, process, or store CHD.
- 3.5.1 3.5.1.3, No PAN is stored on any system within Akamai Compute.
- 3.6.1 3.7.5, Akamai Compute does not transmit, process, or store CHD.
- 3.7.6, No manual clear-text cryptographic keymanagement operations are in use as all cryptographic keys are auto generated by the Vault systems.
- 3.7.7, Akamai Compute does not transmit, process, or store CHD.
- 3.7.8, Akamai Compute does not transmit, process, or store CHD.
- 3.7.9, No cryptographic keys are shared with customers.
- 4.1.1, Akamai Compute does not transmit, process, or store CHD.
- 4.1.2, Akamai Compute does not transmit, process, or store CHD.
- 4.2.1, Akamai Compute does not transmit, process, or store CHD.
- 4.2.1.1, This requirement is best practice until 31 March 2025 and was not assessed during this assessment period.
- 4.2.1.2, Wireless networks are not used to transmit PAN nor is connected to the CDE.
- 4.2.2, End-user messaging technologies is not used to transmit PAN within the Compute environment.
- 5.2.1 5.2.3, Akamai Compute does not operate a standard network where all machines can share a dedicated, private network to communicate with each other.
- 5.2.3.1, This requirement is best practice until 31 March 2025 and was not assessed during this assessment period.



- 5.3.1, Akamai Compute does not operate a standard network where all machines can share a dedicated, private network to communicate with each other.
- 5.3.2, Akamai Compute does not operate a standard network where all machines can share a dedicated, private network to communicate with each other.
- 5.3.2.1, This requirement is best practice until 31 March 2025 and was not assessed during this assessment period.
- 5.3.3, This requirement is best practice until 31 March 2025 and was not assessed during this assessment period.
- 5.3.4, Akamai Compute does not operate a standard network where all machines can share a dedicated, private network to communicate with each other.
- 5.3.5, Akamai Compute does not operate a standard network where all machines can share a dedicated, private network to communicate with each other.
- 5.4.1, This requirement is best practice until 31 March 2025 and was not assessed during this assessment period.
- 6.4.3, Payment pages and scripts are not used within the Compute environment as payments are not collected.
- 7.2.5.1, This requirement is best practice until 31 March 2025 and was not assessed during this assessment period.
- 7.2.6, Akamai Compute systems do not have access to any cardholder data.
- 8.2.3, Akamai Compute employees have no login to the customer's environment.
- 8.3.6, This requirement is best practice until 31 March 2025 and was not assessed during this assessment period.
- 8.3.9, Passwords/ passphrases are not used as the only authentication factor. SSH key pairs are generated for each user and are required for accessing the in scope systems.
- 8.3.10, Passwords/ passphrases are not used as the only authentication factor. SSH key pairs are generated for each user and are required for accessing the in scope systems.
- 8.3.10.1, This requirement is best practice until 31 March 2025 and was not assessed during this assessment period.
- 8.3.11, Logical/ physical security tokens are not in use. Access for authentication is through certificates.
- 8.4.2, This requirement is best practice until 31 March 2025 and was not assessed during this assessment period.
- 8.5.1, This requirement is best practice until 31 March 2025 and was not assessed during this assessment period.
- 8.6.1, This requirement is best practice until 31 March 2025 and was not assessed during this assessment period.



- 8.6.2, This requirement is best practice until 31 March 2025 and was not assessed during this assessment period.
- 8.6.3, This requirement is best practice until 31 March 2025 and was not assessed during this assessment period.
- 9.2.1.1, Akamai Compute does not store or transmit cardholder data.
- 9.2.2, There are no publicly accessible network jacks on Akamai premises.
- 9.4.1.1, Akamai Compute does not store cardholder data.
- 9.4.1.2, Akamai Compute does not store cardholder data
- 9.4.3 9.4.7, Akamai Compute does not store cardholder data.
- 9.5.1 9.5.1.3, Akamai Compute does not have any POI devices that capture payment data via direct physical interaction.
- 10.4.1.1, This requirement is best practice until 31 March 2025 and was not assessed during this assessment period.
- 10.4.2.1, This requirement is best practice until 31 March 2025 and was not assessed during this assessment period.
- 10.7.2, This requirement is best practice until 31 March 2025 and was not assessed during this assessment period.
- 10.7.3, This requirement is best practice until 31 March 2025 and was not assessed during this assessment period.
- 11.2.1, Akamai Compute does not maintain wireless systems within productions networks. Corporate networks do not have the ability to access production networks resulting from strict preventative physical and logical access controls.
- 11.2.2, Akamai Compute does not maintain wireless systems within productions networks. Corporate networks do not have the ability to access production networks resulting from strict preventative physical and logical access controls.
- 11.4.7, This requirement is best practice until 31 March 2025 and was not assessed during this assessment period.
- 12.3.1, This requirement is best practice until 31 March 2025 and was not assessed during this assessment period.
- 12.3.2, This requirement is best practice until 31 March 2025 and was not assessed during this assessment period.
- 12.3.3, This requirement is best practice until 31 March 2025 and was not assessed during this assessment period.
- 12.3.4, This requirement is best practice until 31 March 2025 and was not assessed during this assessment period.



	12.5.2.1, This requirement is best practice until 31 March 2025 and was not assessed during this assessment period.
	12.5.3, This requirement is best practice until 31 March 2025 and was not assessed during this assessment period.
	12.6.3.2, This requirement is best practice until 31 March 2025 and was not assessed during this assessment period.
	12.8.1, Akamai systems do not use external service providers in ways that could affect the security of cardholder data.
	12.10.4.1, This requirement is best practice until 3 rd March 2025 and was not assessed during this assessment period.
	12.10.7, This requirement is best practice until 31 March 2025 and was not assessed during this assessment period.
	A1.1.1 - Not applicable. This requirement is best practice until 31 March 2025 and was not assessed during this assessment period.
	A1.1.4 - Not applicable. This requirement is best practice until 31 March 2025 and was not assessed during this assessment period.
	A1.2.3 - Not applicable. This requirement is best practice until 31 March 2025 and was not assessed during this assessment period.
	Appendix A2, SSL/Early TLS is not in use.
For any Not Tested responses, identify which sub- requirements were not tested and the reason.	Not applicable.



Section 2 Report on Compliance

(ROC Sections 1.2 and 1.3.2)

			I
Date Assessment began:	2024-04-01		
Note: This is the first date that evidence was g			
Trote: Trillo to the mot date that evidence was g			
Date Assessment ended:			2024-05-01
	atharad ar abaam at	iana wasa maada	
Note: This is the last date that evidence was g	alliereu, or observali	ons were made.	
Were any requirements in the ROC unable to b	ne met due to a legal	constraint?	☐ Yes ⊠ No
Trong any requirements in the reco unable to b			
Were any testing activities performed remotely	?		⊠ Yes □ No
If yes, for each testing activity below, indicate w		sement activities	
were performed:	viietiiei ieiilote asse	SSITICITE ACTIVITIES	
were performed.			
Examine documentation	⊠ Yes	П No	
• Examine documentation	<u> </u>		
latan iau namanal	∇ Vaa	Пис	
Interview personnel	⊠ Yes	☐ No	
		57	
Examine/observe live data	☐ Yes	⊠ No	
		<u>_</u>	
 Observe process being performed 		☐ No	
 Observe physical environment 	☐ Yes	⊠ No	
Interactive testing	☐ Yes	⊠ No	
Other: Not applicable.	□Yes	П No	
Other. Not applicable.	□ 163		



Section 3 Validation and Attestation Details

Part 3. PCI DSS Validation (ROC Section 1.7)

	This AOC is based on results noted in the ROC dated (Date of Report as noted in the ROC June 30, 2024).						
	Indicate below whether a full or partial PCI DSS assessment was completed: Full Assessment – All requirements have been assessed and therefore no requirements were marked						
	Not Tested in the ROC.	to have been accessed and therefore he requirements were marked					
		e requirements have not been assessed and were therefore marked uirement not assessed is noted as Not Tested in Part 2g above.					
as ap		ne ROC noted above, each signatory identified in any of Parts 3b-3d, compliance status for the entity identified in Part 2 of this document					
	marked as being either In Place	PCI DSS ROC are complete, and all assessed requirements are or Not Applicable, resulting in an overall COMPLIANT rating; thereby demonstrated compliance with all PCI DSS requirements except those					
	marked as Not in Place, resultin	s of the PCI DSS ROC are complete, or one or more requirements are g in an overall NON-COMPLIANT rating; thereby (Service Provider nstrated compliance with PCI DSS requirements.					
	Target Date for Compliance: Y	YYY-MM-DD					
	An entity submitting this form with a Non-Compliant status may be required to complete the Action Plan in Part 4 of this document. Confirm with the entity to which this AOC will be submitted before completing Part 4.						
	Compliant but with Legal exception: One or more assessed requirements in the ROC are marked as Not in Place due to a legal restriction that prevents the requirement from being met and all other assessed requirements are marked as being either In Place or Not Applicable, resulting in an overall COMPLIANT BUT WITH LEGAL EXCEPTION rating; thereby (Service Provider Company Name) has demonstrated compliance with all PCI DSS requirements except those noted as Not Tested above or as Not in Place due to a legal restriction.						
	This option requires additional review from the entity to which this AOC will be submitted.						
	If selected, complete the following:						
	Affected Requirement Details of how legal constraint prevents requirement from being met						



Part 3. PCI DSS Validation (continued) Part 3a. Service Provider Acknowledgement Signatory(s) confirms: (Select all that apply) The ROC was completed according to PCI DSS, Version 4.0 and was completed according to the instructions therein. \boxtimes All information within the above-referenced ROC and in this attestation fairly represents the results of the Assessment in all material respects. \boxtimes PCI DSS controls will be maintained at all times, as applicable to the entity's environment. Part 3b. Service Provider Attestation Signature of Service Provider Executive Officer ↑ Date: June 30, 2024 Service Provider Executive Officer Name: Mark Carrizosa Title: Director, Information Security Part 3c. Qualified Security Assessor (QSA) Acknowledgement If a QSA was involved or assisted with this QSA performed testing procedures. Assessment, indicate the role performed: QSA provided other assistance. If selected, describe all role(s) performed: Signature of Lead QSA 1 Date: June 30, 2024 Lead QSA Name: Clark Rahman Hank Edley Signature of Duly Authorized Officer of QSA Company 1 Date: June 30, 2024 Duly Authorized Officer Name: Hank Edley QSA Company: Part 3d. PCI SSC Internal Security Assessor (ISA) Involvement If an ISA(s) was involved or assisted with this ☐ ISA(s) performed testing procedures. Assessment, indicate the role performed: ☐ ISA(s) provided other assistance. If selected, describe all role(s) performed:



Part 4. Action Plan for Non-Compliant Requirements

Only complete Part 4 upon request of the entity to which this AOC will be submitted, and only if the Assessment has Non-Compliant results noted in Section 3.

If asked to complete this section, select the appropriate response for "Compliant to PCI DSS Requirements" for each requirement below. For any "No" responses, include the date the entity expects to be compliant with the requirement and provide a brief description of the actions being taken to meet the requirement.

PCI DSS Requirement	Description of Poquiroment		nt to PCI nirements t One)	Remediation Date and Actions (If "NO" selected for any	
		YES	NO	Requirement)	
1	Install and maintain network security controls				
2	Apply secure configurations to all system components				
3	Protect stored account data	\boxtimes			
4	Protect cardholder data with strong cryptography during transmission over open, public networks				
5	Protect all systems and networks from malicious software				
6	Develop and maintain secure systems and software				
7	Restrict access to system components and cardholder data by business need to know				
8	Identify users and authenticate access to system components				
9	Restrict physical access to cardholder data	\boxtimes			
10	Log and monitor all access to system components and cardholder data				
11	Test security systems and networks regularly	\boxtimes			
12	Support information security with organizational policies and programs				
Appendix A1	Additional PCI DSS Requirements for Multi- Tenant Service Providers				
Appendix A2	Additional PCI DSS Requirements for Entities using SSL/early TLS for Card-Present POS POI Terminal Connections				











